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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
(Terre Haute, Indiana)

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)
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MB Docket No. _____

RM - _____

To: Office of Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

PETITION FOR RULE MAKING

Word Power, Inc., by its counsel, hereby submits this Petition for Rule Making requesting the reservation of Channel *298B at Terre Haute, Indiana for noncommercial educational use in response to the Public Notice of September 30, 2003 (DA 03-2990) and pursuant to the Second Report and Order in Reexamination of the Comparative Standards for Noncommercial Educational Applicants, ("Second R&O") MM Docket 95-31, 18 FCC Rcd 6691, 6703-06 (2003).¹ In support of the reservation of Channel *298B at Terre Haute, Indiana, Word Power, Inc. states as follows:

1. In the Second Report & Order, supra, the Commission revised the showing required for the reservation of commercial channels for noncommercial educational use. Previously, the Commission would only reserve a commercial channel if the petition demonstrated that no reserved frequencies were available due to the proximity of VHF TV Channel 6 or Canadian/Mexican use of the reserved band. The Second Report & Order expands this criteria and allows consideration of the reservation if there are no other reserved frequencies

¹ The Public Notice lists Channel 298A at Terre Haute. However, the channel is listed in the FM Table of Allotments, Section 73.202(b) as Channel 298B. It appears that the Public Notice listing is incorrect.

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List ABOVE _____

014
FM-MB
03-432


and the proposed use would provide a first or second noncommercial educational service to at least 2,000 persons and 10% of the population within the 60 dBu contour.

2. The enclosed Engineering Statement indicates that there are no other reserved band frequencies available which would provide a 60 dBu contour to at least 50% of Terre Haute. In addition, the Engineering statement indicates that a first or second NCE service would be provided to 36.7% of the proposed 60 dBu contour. The population breakdown would be 23,906 persons receiving a first NCE service and 69,525 persons receiving a second NCE service for a total of 93,431 persons out of 254,602 in the service area. These totals exceed the 10% and 2,000 person tests. Accordingly, this request to reserve Channel *298B for NCE use at Terre Haute, Indiana meets the standards adopted in the Second Report and Order.

3. Should Channel *298B become reserved at Terre Haute, Word Power, Inc. will file an application which provides the first and second NCE service and will construct the facility as authorized.

Respectfully submitted,

WORD POWER, INC.

By:  ^{D.M.K.}
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Its Counsel

November 21, 2003

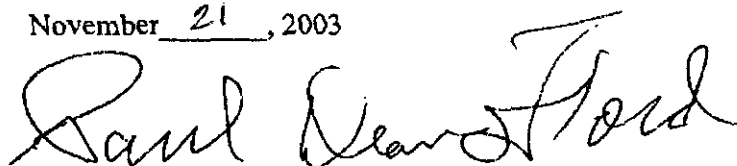
277351_1.DOC

Paul Dean Ford, P.E. has conducted an FM Frequency Search of the Educational Channels (201 through 220) at the proposed operational site for FM Channel 298B at Terre Haute, IN and determined that there is no available channel in that range that is available for full Class B facilities for operation from the city coordinates of Terre Haute, IN or due North, East, South or West at a location 51 kilometers (52km distance to Class B 60dBu minus 1 km) from city center.

Also, a check was made to determine whether or not a minimum Class B operation (25kW ERP from 103.5 meters HAAT) could be assigned to Terre Haute center coordinates. Using terrain data from that site, the proposed predicted 60dBu contour goes out an average of 39.5km (ranging from 36.5 to 42.4km) which is 0.5km greater than the Class B1 maximum and the 40dBu goes out an average of 114.2km, ranging from 111.1km to 117.8km, depending upon varying terrain. The FM Frequency Search data demonstrated that it is not possible to assign a Class B channel to the NCE band at Terre Haute center because of interference to and/or from existing or proposed facilities.

Paul Dean Ford has prepared this data personally and that all facts contained herein are true of his own knowledge, except where stated to be on information or belief, and as those facts, he believes them to be true.

November 21, 2003

A handwritten signature in cursive script that reads "Paul Dean Ford". The signature is written in dark ink and is positioned above the printed name.

Paul Dean Ford, P.E.

WORD POWER, INC. submits this Petition for Rulemaking to amend the FM Table of Allotments, Section 73.202(b), requesting that the Commission change the Terre Haute, Indiana allocation of 298B from commercial to non-commercial.

There is no equivalent reserved band channel available for allotment to Terre Haute, Indiana.

The attached map shows that the proposed Terre Haute, Indiana operation would provide service to an area of 8,526.3 square kilometers and a population (2000 Census) of 254,602.

A first non-commercial service would be provided to a population of 23,906 (2000 Census).

A second non-commercial service would be provided to a population of 69,525 (2000 Census).

A total population provided a first and a second non-commercial service is 93,431 (2000 Census), which is 36.7% of the 1mV/m contour population.

Prepared by Paul Dean Ford, P.E. November 21, 2003.

A handwritten signature in cursive script, reading "Paul Dean Ford". The signature is written in black ink and is positioned below the typed name.

Word Power, Inc. |

STUDY 298B for NCE |

Showing Area 1st & 2nd

| NCE Service 11/10/03

Paul Dean Ford, P.E.

1st Serv 23,906 (2000Cen)

2nd Serv 69,525 (2000Cen)

Total 93,431 (36.7%)

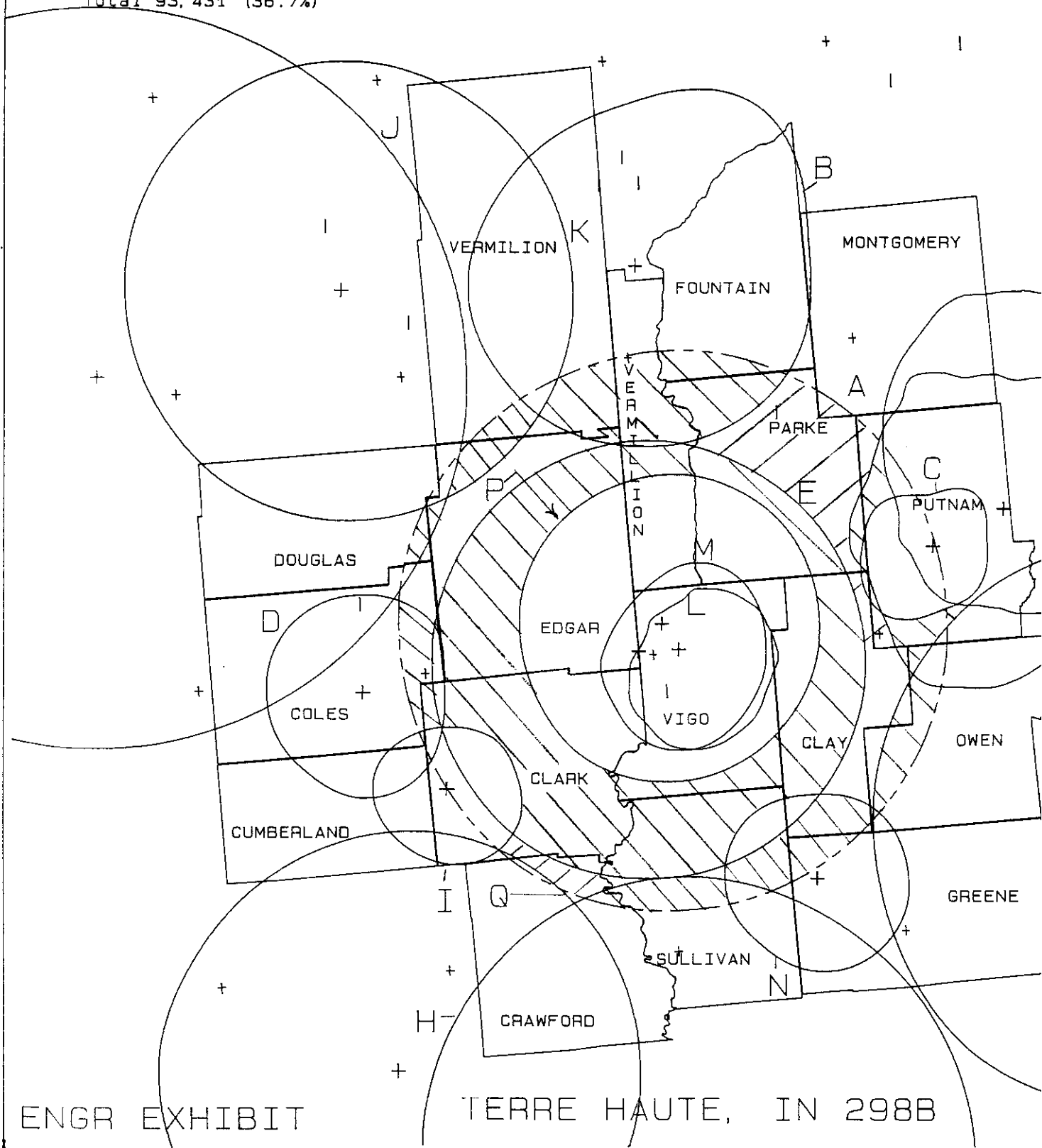
1mV/m Area & Pop 298B

Area = 8,526.3 sq.km.

Population = 254,602

1st Service //

2nd Service \\\



KEY TO CONTOURS

A - - -

A Prop 60dBu 298B
50kW ERP 150M HAAT
39, 33, 01, 87, 28, 32

B

B WFOF, Covington, IN 60dBu
212 (B1) 19kW ERP 81m HAAT
40, 09, 08, 87, 27, 58

C

C WGRE, Greencastle IN 60dBu
C 0.800kW ERP 54m HAAT
218 (A) 39, 38, 19, 86, 51, 49

D

D WEIU, Charleston, IL 60dBu
4.81kW ERP 44.8m HAAT 205A
39, 28, 31, 9, 88, 08, 21, 9

E

E WISU, Terre Haute, IN 60dBu
209B 13.5kW ERP 156m HAAT
39, 30, 26, 87, 31, 50

F

F WPSM, Cloverdale, IN 60dBu
0.011kW (h), 22.5kW (v) ERP 2
RC=385m 39, 41, 19, 86, 42, 03

G

G WFIU, Bloomington, IN
60dBu 34kW ERP 180m HAAT
279 (B) 39, 08, 32, 86, 29, 43

H

H WVUB, Vincennes, IN
60dBu 50kW ERP 152m HAAT
216 (B) 38, 39, 06, 87, 28, 37

I

I WLHW (CP), Casey, IL 60dBu
218A 6kW ERP 60m HAAT
39, 18, 14, 87, 58, 15

J

J WILL, Urbana, IL 60dBu
105kW ERP 259m HAAT 215B
40, 02, 18, 88, 40, 10

K

K WBGL, Champaign, IL 60dBu
219B 20kW ERP 137m HAAT
40, 09, 09, 88, 06, 56

L

L WCRT, Terre Haute, IN 60dBu
1.05kW ERP 98m HAAT
203 (A) 39, 30, 14, 87, 26, 37

M

M WMHD, Terre Haute, IN 60dBu
214 (A) 1.4kW ERP 70m HAAT
39, 30, 14, 87, 26, 37

N

N WYTJ, Linton, IN 60dBu
1.0kW ERP 89m HAAT
207A 39, 05, 59, 87, 10, 59

O

O WSPV, Greencastle, IN
60dBu 15kW DA ERP 133m HAAT
213B 39, 41, 19, 86, 42, 03

P

P WPFR, Clinton, IN 60dBu
230A 2.35kW ERP 161m HAAT
39, 33, 01, 87, 28, 32

Q

Q WUSI-FM, Olney, IL 212B
25kW ERP 144m HAAT
38, 50, 18, 88, 07, 46

KILOMETERS



REFERENCE POINT COORDS:

LATITUDE: 38 45 0

LONGITUDE: 89 0 0

MAP PROJECTION-ALBERS

TIC MARK INTERVAL: .5°